

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief *Amici Curiae* of the Assembly of Canonical Orthodox Bishops of the United States of America, *et al.*, supporting the Petitioners in No. 21-164, *Trustees of the New Life In Christ Church, Petitioner v. City of Fredericksburg, Virginia*; contains 2,593 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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